

Monica Perales
Attorney at Law: 297739
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
Tel: (562)437-7006
Fax: (562)432-2935
E-Mail: rohlfiging.office@rohlfiginglaw.com
Attorneys for Plaintiff
ALEJANDRO ALDACO FLORES

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ALEJANDRO ALDACO FLORES)	Case No.: 1:20-cv-01780-EPG
)	
Plaintiff,)	STIPULATION AND ORDER TO
v.)	EXTEND TIME TO FILE REPLY
)	
KILOLO KIJAKAZI,)	(FIRST REQUEST)
Acting Commissioner of Social)	
Security,)	
)	
)	
Defendant.)	

Plaintiff Alejandro Aldaco Flores and Defendant Kilolo Kijakazi, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 28 days from December 15, 2021 to January 13, 2022 for Plaintiff to file a Reply, with all other dates in the Court's Scheduling Order extended accordingly. This is Plaintiff's first

///

///

1 request for an extension. This request is made at the request of Plaintiff's counsel
2 to allow additional time to fully research the issues presented. Counsel's disabled
3 mother suffered a femur/knee fracture resulting in a nonunion on March 1, 2020.
4 Due to her underlying health conditions, and the COVID-19 pandemic there was a
5 delay in having a surgery to correct the nonunion resulting in Counsel's mothers
6 continual need of daily care to be mobile.

7 Counsel's mother fell on July 27th, requiring emergency surgery to remove
8 the broken hardware and begin the nonunion revision. Due to underlying health
9 conditions Counsel's mother second revision surgery was scheduled for October
10 20, 2021 but due to infections surgery was again postponed. Currently Counsel's
11 mother is suffering from a Lupus flare resulting in being bedridden. Counsel has
12 had to take time off work to help with her care.

13 DATE: December 16, 2021

Respectfully submitted,

14 LAWRENCE D. ROHLFING

15 /s/ *Monica Perales*

16 BY: _____

Monica Perales

17 Attorney for plaintiff Mr. Alejandro Aldaco Flores

18
19 DATE: December 16. 2021

PHILLIP TALBERT

Acting United States Attorney

21 PETER K. THOMPSON

Regional Chief Counsel

22 Social Security Administration
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

/s/ *Chantal R. Jenkins*

BY: _____

Chantal R. Jenkins
Special Assistant United States Attorney
Attorneys for defendant Kilolo Kijakazi,
Acting Commissioner of Social Security
[*authorized by e-mail]

ORDER

Pursuant to the parties' stipulation (ECF No. 18), IT IS HEREBY ORDERED that Plaintiff shall file a Reply Brief by January 13, 2022.

IT IS SO ORDERED.

Dated: **December 21, 2021**

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE